

*Tuesday May 30, 2006*

**MFU comments to the U.S.D.A. re: Docket # TM-05-14 advanced notice of proposed rulemaking on access to pasture concerning organic livestock production.**

To whom it may concern:

Minnesota Farmers Union (MFU) appreciates the opportunity to urge support for language that is clearer than the existing rules regarding “access to pasture standards” that pertain to certified organic livestock operations operating in the United States.

MFU is a grassroots based organization that has represented family farms in Minnesota since 1929. MFU supports the policies and procedures for those producers, who choose to farm organically, and access to pasture is an issue that our members feel strongly about and feel is critical to ensuring consumer confidence, environment and animal well-being.

MFU would submit these suggestions for your consideration when undergoing rulemaking:

- 1.) Require dairy cows to and other ruminants to graze pasture for a minimum of 120 days while maintaining exemptions for health and inclement weather.
- 2.) Require an average daily dry matter intake of 30% or more from pasture during the 120 day grazing period.
- 3.) Allow calves less than 6 months old to be temporarily confined if needed.
- 4.) Include a “per acre” rule for grazing dairy cattle, MFU producers suggest a minimum of two acres per animal.

Again members of the Minnesota Farmers Union oppose the idea of zero to minimal pasture time for organic livestock production, urge the consideration of these recommendations by the U.S. National Organic Program.

Doug Peterson, President